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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In re RIPPLE LABS INC. LITIGATION,

DISCOVERY MATTER

Case No. 18-cv-06753-PJH

This Document Relates To:
ALL ACTIONS

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME OF MOTION
FOR RELIEF FOR GSR HOLDINGS, INC.**

1 Pursuant to Civ. L.R. 6-2, Lead Plaintiff Bradley Sostack (“Plaintiff”), Defendants Ripple
2 Labs Inc, XRP II, LLC, and Bradley Garlinghouse (collectively, “Defendants”), and GSR
3 Holdings, Inc. (“GSR”) hereby stipulate as follows:

4 **WHEREAS**, on April 28, 2022, the Court ordered that Defendants produce all documents
5 and written discovery produced in *Securities and Exchange Commission v. Ripple Labs, Inc.*, 20
6 Civ. 10832 (AT), S.D.N.Y) (the “SEC Action”) and that Plaintiff must provide notice to all
7 relevant third parties who have not previously consented to production within seven days of the
8 Order (the “April 28, 2022 Order”);

9 **WHEREAS**, in the April 28, 2022 Order, the Court also ordered that any third party who
10 does not consent to production must notify both Plaintiff and Defendants of their intent to object
11 within fourteen days of receipt of the notice and must file any motion for relief within twenty-one
12 days of receipt of such notice;

13 **WHEREAS**, on May 4, 2022, Plaintiff provided notice of the April 28, 2022 Order to
14 GSR, a third party in this matter who produced documents in the SEC Action;

15 **WHEREAS**, GSR timely notified Plaintiff and Defendants of its intent to object to
16 production by May 18, 2022;

17 **WHEREAS**, after receiving GSR’s notification, Plaintiff and GSR met and conferred over
18 telephone and email about the documents that GSR will produce to Plaintiff pursuant to the April
19 28, 2022 Order;

20 **WHEREAS**, on May 24, 2022, the parties filed a stipulation to extend the deadline for any
21 motion for relief until June 2, 2022, which the Court granted, *see* Dkt. 172, 174;

22 **WHEREAS**, Plaintiff and GSR have continued to meet and confer about the documents
23 that GSR will produce;

1 **WHEREAS**, the parties request to extend the June 2, 2022 deadline for GSR to seek relief
2 from the Court to allow the parties to continue to meet and confer productively; and

3 **WHEREAS**, granting this extension is not expected to affect the schedule for the matter.

4 **NOW, THEREFORE, IT IS HEREBY STIPULATED** by and between Lead Plaintiff,
5 Defendants, and GSR, through their respective counsel, that:

- 6
7 1. GSR's deadline to move the Court for relief from its April 28, 2022 Order is extended
8 until June 24, 2022.

9 Dated: June 2, 2022

By: /s/ Nicholas N. Spear

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26
27 Dated: June 2, 2022

By: /s/ Suzanne E. Nero

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22 *Attorneys for Defendants Ripple Labs Inc.,*
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24 Dated: June 2, 2022

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Attorney for GSR Holdings, Inc.

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, I attest that concurrence in the filing of this document has been obtained from the other signatories.

DATED: June 2, 2022

/s/ Nicholas N. Spear

Nicholas N. Spear